



## Safeguarding Policy and Procedures

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## Safeguarding Policy

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## 1. Purpose

- 1.1 To offer guidance and instructions to all staff, governors, volunteers, sub-contractors and contractors to ensure the College commitment to safeguarding and promoting the welfare of young people and vulnerable adults. If any form of abuse is suspected or if a person is identified as being vulnerable to being drawn into terrorism-related activity, appropriate action will be taken.

The College requires all staff to share this commitment.

## 2. Scope

- 2.1 This policy deals with the protection of children and young people and all adults at risk. Throughout this policy reference is made to 'children and young people'. This term is used to mean those under the age of 18 years and an adult at risk is deemed to be a person who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against harm or exploitation. Any person up to the age of 24 with a current Educational Health and Care Plan in place is treated as a child for the purposes of safeguarding & child protection legislation.

All references to staff or adults comprises teaching staff, other staff and volunteers working in the organisation, visitors and includes contractors to the organisation with direct contact with learners, regardless of position, role or responsibilities.

The term 'safeguarding children, young people and adults at risk' covers both reactive child protection and a preventative approach to keeping young children and adults safe. Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

A vulnerable learner may be identified as a person who:

- Is a Looked After Child
- Is a care leaver
- Is a young carer
- Has learning difficulties or disabilities
- Has mental health difficulties (e.g. dementia, personality and eating disorders)
- Has general welfare concerns
- Has a physical or sensory disability
- Has been involved in substance or alcohol misuse
- Has suffered from domestic violence
- Has social or emotional developmental needs
- Has a criminal conviction
- Has a language barrier

- 2.2 Lambeth College recognises that safeguarding and promoting the welfare of children and vulnerable adults is everyone's responsibility, and that the best interests of the child

must be paramount. We believe that not only do we have a statutory duty to ensure that we safeguard and promote the welfare of children, young people and adults at risk of harm in our care, but also a moral duty. It adopts a child centred approach which operates in the best interests of the child. The policy and procedures focus on how we recruit and train our staff, support our learners, make referrals and deal effectively with allegations against staff. It incorporates a wide range of risks we need to safeguard against, including those related to the prevention of violent extremism.

To achieve this, the College will annually review this policy and procedure with the aim of:

- Raising awareness of issues relating to the welfare of children, young people, adults at risk and the promotion of a safe environment for them to learn within the College.
- Aiding the identification of children, young people and adults at risk of significant harm, providing procedures for reporting concerns.
- Ensuring that learners in need of additional support are identified through enrolment and referred to the Supported Learning and ALS teams.
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff.
- Responding to the safe recruitment of staff.
- All staff working with children, young people and adults at risk will receive appropriate training in order to familiarise them with the College's Safeguarding Policy and Procedure, relevant statutory guidance, the safeguarding issues and their responsibilities therein.
- All staff to undertake mandatory safeguarding and Prevent training (to include 'Part One of Keeping Children Safe in Education 2018) as part of their induction process and continual professional development (CPD) on an annual basis, and all staff with a role in directly working with under 18s will be required to read and understand Part One and Annex A of Keeping Children Safe in Education 2018.

### **3. Statutory Framework**

3.1 Lambeth College aims to meet legislative requirements and good practice in safeguarding. There are a number of statutory regulations which place a responsibility on the college to protect young people and adults at risk. This statutory framework includes:

- The statutory guidance Keeping Children Safe in Education 2018, Working Together to Safeguarding Children 2018, the Safeguarding Vulnerable Groups Act 2006, The Protections of Freedom Act 2012 and the Prevent Duty Guidance are the key documents upon which this policy is based.
- Prevent Duty Guidance for Further Education Institutions in England and Wales July 2015.
- The Children Act 2004, which is fundamental to professionals working with children and young people in the UK.
- The Protection of Children Act 1999 requires employers to carry out Criminal Record Checks before employees are allowed to come into contact with children.

- The Education Act 2002 requires that governing bodies of FE providers have a statutory duty to make arrangements to safeguard and promote the welfare of children and young people.
- The Sexual Offences Act 2003 makes it is an offence for a person over 18 (e.g. a lecturer or other member of staff) to have a sexual relationship with a child under 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works in the same establishment as the child, even if s/he does not teach The Safeguarding Vulnerable Groups Act 2006 which sets out the type of activity in relation to children and adults at risk for which employers and individuals will be subject.
- The Protection of Freedoms Act 2012 which changed the definition of Regulated Activity including who is eligible for a barred list check.

#### 4. Prevent Duty

4.1 In line with the *Prevent Duty Guidance for Further Education Institutions in England and Wales* (2015), protecting learners from the risk of radicalisation is part of the Colleges' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. Learners may be identified as vulnerable to radicalisation at any time during their programme of study based on behaviour. The Channel framework of indicators which may provide triggers leading to engagement with a group, cause or ideology associated with terrorism may include:

- Feelings of grievance and injustice
- Feeling under threat
- A need for identity, meaning and belonging
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others
- Susceptibility to indoctrination
- A desire for political or moral change
- Opportunistic involvement
- Family or friends involvement in extremism
- Being at a transitional time of life
- Being influenced or controlled by a group
- Relevant mental health issues

4.2 Statutory *Prevent Guidance for Further Education* (2015) summarises the requirements in terms of the following key areas: external speakers and events, partnerships, risk assessment and action plan, staff and learner training, welfare and pastoral care and IT Policies.

Radicalisation refers to the process by which a person comes to support terrorism or other forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. During the process of

radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

- 4.3 The College will work with partnerships including the BIS Regional FE/HE Prevent Co-ordinator and Prevent Programme Co-ordinator for Lambeth to ensure it is responding to this duty guidance.
- 4.4 All staff working in Lambeth College (including visiting staff, volunteers, contractors and Learners on placement) are required to be able to identify and report instances where they believe a young person may be at risk of harm or neglect including any harm through extremism or radicalisation to the Deputy Designated Safeguarding Lead. All learners will be given information about radicalisation and extremism, they will have a safe place to discuss the risk relating to their communities and they will know where to go to ask for help.
- 4.5 Under the Prevent Duty, safeguarding staff will be trained to recognise when it is appropriate to make a referral to the Channel Programme to support learners who may be vulnerable to such influences and where we believe a learner is being directly influenced by extremist materials or influences.

It is unacceptable to download or transmit any material which might reasonably be considered obscene, abusive, sexist, racist, defamatory, related to violent extremism or terrorism or which is intended to annoy, harass or intimidate another person. This also applies to use of social media systems accessed from College systems.

The college has systems for assessing and rating risks. Risk assessments for planned events, including off site events, external visitors and speakers to mitigate any risk and clearly set out what is required for any event to proceed. In addition, the college has in place a Disaster Management Plan.

## 5. Safeguarding Definitions

The College recognises the following as definitions of abuse for children, young people and adults at risk of harm, physical, emotional, neglect, sexual abuse and exploitation, emotional abuse and financial.

**Physical Abuse** - this may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring.

A child going missing from education is a potential indicator of abuse or neglect. Staff should follow the procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

**Neglect** - neglect is the persistent or severe failure to meet a child, young person or vulnerable adult's physical and/or psychological needs which can result in serious impairment of the health or development of the individual.

**Sexual Abuse and Exploitation** - sexual abuse involves a child, young person or vulnerable adult being forced or coerced into participating in or watching sexual activity. It is not necessary for the child, young person or vulnerable adult to be aware that the activity is sexual and the apparent consent of the child, young person or vulnerable adult is irrelevant. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.

**Emotional Abuse** - emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child, young person and vulnerable adult's behaviour and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse. This would include potentially abusive or offensive cyber-bullying through electronic communications.

**Financial Abuse** - where financial abuse occurs, the victim does not always realise that it is abuse. It can be in the form of asking for money to be your friend, stealing your belongings, taking someone's pension, or just the constant borrowing of money and never returning it.

**Significant Harm** - some children may be in need because they are suffering or likely to suffer significant harm. The Children Act V section 47 (1) introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interest of the children.

### **Specific safeguarding issues**

All staff should have awareness of the following safeguarding issues and of the legislative duty in relation to these concerns.

**Honour-based violence** - honour-based violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so called HBV are abuse and should be handled and escalated as such.

**FGM mandatory reporting duty** - from October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales. Professionals must make a report to the police, if, in the course of their duties:

- They are informed by a girl under the age of 18 that she has undergone an act of FGM.
- They observe physical signs that an act of FGM may have been carried out on a girl under the age of 18.

**Forced Marriage** - forced marriage is a term used to describe a marriage in which one or both of the parties is married without his or her consent or against his or her will. A forced marriage differs

from an arranged marriage, in which both parties consent to the assistance of their parents or a third party (such as a matchmaker) in identifying a spouse.

**Peer on Peer Abuse** - peer on peer abuse is a significant issue. It must never be tolerated, dismissed or ignored. Whilst it is clear that peer on peer abuse disproportionately affects females and the College must have appropriate support mechanisms in place, males, LGBTQ and SEND learners will also be affected by this issue and staff must be aware of this and prepared to act accordingly

Peer on peer abuse will be minimised through the vigilance and awareness of staff to recognise and identify where such abuse is occurring, and to act swiftly to ensure its curtailment. All disclosures will be recorded and reviewed termly by the DSL and Deputy DSL and Safeguarding Co-ordinator in the Safeguarding Report for Governors to ensure appropriate support mechanisms are in place for both victims and perpetrators.

Most cases of learners hurting other learners will be dealt with under our College's Career Ready Standards Policy, however, this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put learners at the college at risk
- Is violent
- Involves learners being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female learners, and initiation or hazing type violence with respect to boys
- Ensuring our tutorials provision helps to educate learners about appropriate behaviour and consent
- Ensuring learners know they can talk to staff confidentially
- Ensuring staff are trained to understand that a learner harming a learner could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

**Sexting** - if staff are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), they must report it to the Safeguarding Team immediately.

Staff must **not**:

- View, download or share the imagery yourself, or ask a learner to share or download it. If staff have already viewed the imagery by accident, this must be reported to the Safeguarding Officer.
- Delete the imagery or ask the learner to delete it

- Ask the learner(s) who are involved in the incident to disclose information regarding the imagery (this is the Safeguarding Officer's responsibility)
- Share information about the incident with other members of staff, the learner(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

Staff should explain that they need to report the incident, and reassure the learner that they will receive support and help from the Safeguarding Officer.

## **11. Child on child sexual violence and sexual harassment**

Where any reports are made of child on child sexual violence or sexual harassment these must be dealt with seriously and quickly. The normal disclosure protocols apply. Where such an allegation is made, the Safeguarding Team will conduct a thorough risk assessment that considers:

- The victim, especially their protection and support
- The alleged perpetrator: and
- All the other children (and, if appropriate, adult learners and staff) at the college, especially any actions that are appropriate to protect them.

This will be recorded and communicated to all staff that are required to know. Both victim and (alleged) perpetrator will receive appropriate support mechanisms from the college on a case by case basis.

### **Specific Safeguarding issues also include the following:**

- Bullying including cyber-bullying
- Children missing education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate crimes
- Mental health
- Missing children and adults
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Trafficking
- Peer-on-peer abuse
- Stalking

In addition, given the local context of the London Borough of Lambeth, the college recognises

that learners will have risk factors around county lines, serious youth violence including grooming and money laundering.

## **6. Governing Body Responsibilities**

6.1 The Governing Body at Lambeth College have specific responsibility for ensuring that the College monitors the impact of its work. The Governing Body instructs the College to:

- Provide a safe environment for children, young people and adults at risk of harm to learn in. Identify those that are suffering, or are likely to suffer significant harm or who are at risk of radicalisation.
- Governing bodies should ensure appropriate IT filters and monitoring systems are in place to ensure online safety.
- Take appropriate action to see that learners and children in the Nursery are kept safe at the College, and also that disclosures of potential abuse occurring at home or elsewhere are reported appropriately.
- Have a system for identifying concerns in relation to abuse of adults at risk of harm and effective methods of responding to disclosures.
- Refer concerns that a child, young person or adult at risk of significant harm or might be at risk of significant harm to the appropriate referral agents.
- Work effectively with others as required by Keeping children safe in education September 2016.
- Listen to the voice of the child and always act in the interest of the child
- Ensure appropriate safeguarding responses for children who go missing from College.
- Ensure there is an effective Safeguarding Policy in place together with a Staff Code of Conduct which include staff/learner relationships and communications including use of social media.
- Understand that additional barriers can exist for children with special educational needs (SEN) and disabilities when recognising abuse and neglect in this group
- Appoint a designated Safeguarding Governor.

6.2 The Governing Body will approve and annually review policies and procedures and receive regular information relating to safeguarding with the aim of:

- Maintaining awareness of progress across the College and/or issues relating to the welfare of children, young people and adults at risk of harm.
- Being reassured by the Principal and DSL manager that systems are in place and effective in relation to the identification of children, young people and adults at risk of harm, and procedures for reporting concerns are widely known.
- Ensuring effective procedures for reporting and dealing with allegations of abuse by members of staff or others who come into contact with learners through College activity are in place including referral to Designated Officer in the local authority.
- Ensuring safe recruitment of staff and volunteers.
- Ensuring staff are appropriately trained to discharge their duties in relation to

safeguarding and Prevent.

- Ensuring procedures are in place to make referral to the Disclosure and Barring Services (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been if they had not resigned.

In developing policies and procedures, the Governing Body will take account of guidance issued by the Department for Education, Keeping children safe in education, Sep 2018, Ofsted (*Inspecting Safeguarding in Early Years Education and Skills Settings*, Oct 2016) and other relevant bodies and groups. The College recognises its duty under the *Counter-Terrorism and Security Act (2015)* to have due regard to the need to prevent people from being drawn into terrorism.

### **6.3 Designated governor with responsibility for Safeguarding and Prevent**

The designated Safeguarding and Prevent Governor is responsible for liaising with the Principal and Senior Designated staff members over matters regarding Safeguarding and Prevent including:

- Ensuring the College has procedures and policies in place which are consistent with guidelines
- Ensuring the governing body considers the College Policy on Safeguarding each Year
- Ensuring that each year the governing body is informed of how the College and its staff have complied with the policy, including, but not limited to a report on the training that staff have undertaken
- Ensuring that the governing body is informed of the Prevent duty in relation to the college

The Designated Safeguarding and Prevent Governor is responsible for overseeing the liaison between agencies, e.g. police, social services in connection with allegations against the Principal, the Senior Designated staff member and the staff member with lead responsibility. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries. To assist in these duties the designated governor should receive appropriate training.

## **7. Staff Roles and Responsibilities**

### **7.1 Designated Member of Staff with lead responsibility for safeguarding**

The Designated Safeguarding Lead is the Assistant Principal, Curriculum and Learner Services, a member of the College Leadership Group. The Deputy Designated Safeguarding Lead is the Head of Learner Services. Whilst the activities of the designated safeguarding lead will be delegated to the deputy, the ultimate lead responsibility for safeguarding and child protection remains with the designated lead and they will ensure appropriate and robust systems are in place that will co-ordinate reporting, monitoring,

referral and support procedures.

The designated member of staff with lead responsibility has a key duty for raising awareness across all staff of issues relating to the welfare of children, young people and adults at risk studying within the College.

The post holder is required to have training in safeguarding issues and inter-agency working, receive refresher training every two years and keep updated annually on safeguarding information and knowledge. The designated lead member of staff is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to the relevant investigating agencies.
- Providing advice and support to other staff on issues relating to safeguarding.
- Providing all staff and leaders with regular updates on safeguarding at least annually
- Maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral).
- Ensuring Safeguarding Policy is updated and reviewed annually and approved by Governors.
- Ensuring that parents of children, young people and adults at risk within the College are aware of the College's Safeguarding Policy.
- Developing effective working relationships with other agencies: Police, Social Services, Health Authority and Safeguarding Partners (previously Local Safeguarding Children's Board) until such time as new arrangements are put in place as specified in Working Together to Safeguard Children 2018 comes into effect and then to work collaboratively within these new arrangements). According to the new guidance, Safeguarding Partners will consist of three agencies: local authorities, clinical commissioning groups, and chief officers of police.
- Liaising with secondary schools which send pupils to the College to ensure that appropriate arrangements are made for pupils.
- Ensuring that staff who are liaising with employers and training organisations that receive children or young people from the College on long term placements have appropriate safeguards are put in place.
- Ensuring safe recruitment practices by implementing enhanced checks on all new and existing staff in accordance with the Disclosure and Barring Service (DBS), obtaining references and recruitment in accordance with Department of Education guidance.
- Providing tutorial or other curriculum, learning or pastoral support. The curriculum (both formal and informal) will be used to help children, young people and adults to develop their self-esteem and to promote their resilience.
- Ensuring that staff receive basic training in Safeguarding and Prevent issues appropriate to their roles and are aware of the College safeguarding procedures.
- Ensuring that the college consults with the LADO (Local Authority Designated Officer) regarding allegations against staff.
- Ensure that Health and Safety procedures are in place for learners, including off site learners on excursions or trips.

- Providing termly safeguarding reports to the Board of Governors.

## 7.2 Other Designated staff with responsibility for safeguarding

Within the Learner Services Team and college there are several staff members who are trained in safeguarding and there is also a Designated Lead for supporting Looked After Children, this is the Safe. These staff members form the Safeguarding Team and are responsible for monitoring and managing incidents or concerns, and liaising with safeguarding agencies. The College Governing Body receives an annual report from the Assistant Principal for Curriculum and Learner Services which reviews how the duties have been discharged and ensures that the College is meeting its statutory requirements. Names of these staff are at Appendix B. These designated staff:

- Report to the member of staff with lead responsibility
- Know how to make an appropriate referral
- Are available to provide advice and support to staff on issues relating to safeguarding and Prevent
- Are available to listen to children, young people, LAC's and adults at risk studying in the College
- Deal with individual cases, including attending case conferences and review meetings as appropriate

## 7.3 Allegations against a staff member or volunteer

**If you have concerns about a member of staff or volunteer**, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the DSL. If the concerns/allegations are about the DSL, speak to the Principal. The College will consult with the Local Authority Designated Officer (LADO) regarding allegations against staff. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).

**Inform the accused individual of the concerns or allegations** and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

**Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual** from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.

**If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to

suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.

**If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

**If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.

**Provide effective support** for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

**Keep the parents or carers of the child/children involved informed** of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).

**Make a referral to the DBS** where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

#### **7.4 Confidentiality**

Confidentiality and trust should be maintained as far as possible, but staff must act on the basis that the safety of the learner is the overriding concern. The degree of confidentiality will be governed by the need to protect the student. The learner must be informed at the earliest possible stage of the disclosure that the information will be passed on. Discussions of the case must only be with the appropriate staff and any discussion must be private and shared on a need to know basis. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare, and protect the safety of children.

Lambeth College Is committed to protecting the rights and privacy of individuals, including learners, staff and others, in accordance with the General Data Protection Regulation (GDPR) May 2018 and complies with the requirements of the Data Protection Act 1998 that allows for disclosure of personal data where this is necessary to protect the vital interests of the learners

#### **7.5 Duty of Care**

Staff are accountable for the way in which they exercise authority, manage risk, use resources and actively protect children and people from discrimination and avoidable harm. Staff should develop respectful, caring and professional relationships between themselves and all other

users of the College. Staff behaviour should demonstrate integrity, maturity and good judgement.

## **7.6 Breach of Trust**

Under the Sexual Offences Act 2003, it is an offence for a person over 18 to have a sexual relationship with a young person under 18 where that person is in a position of trust in respect of that young person, even if the relationship is consensual. This applies when the young person is in full time education and the person works in the same establishment as the young person, even if he/she does not teach the child. Where a sexual relationship exists between a staff member and a student aged over 18 or over, it is required that the staff member discloses this to HR immediately.

## **7.7 College Safeguarding Recording**

- All safeguarding concerns are either identified by, or referred through to, the Safeguarding Team by members of staff, learners, (either self-referring or bringing concerns about peers), parents/carers, employers or volunteers.
- The Safeguarding Team will investigate all concerns and allegations, make a judgement on next steps and then refer on to the appropriate agency.
- The Safeguarding Team will take advice from the Safeguarding Co-ordinator, Deputy DSL or DSL on complex cases and where there are concerns about threshold levels for referrals.
- All cases are recorded in secure area on Promonitor.
- A termly and annual Safeguarding Report is devised for Governors with detailed analysis of safeguarding disclosures which feeds into planning for training needs and preventative work with learners.

## **8. 14-16s in College**

- The College will ensure that all 14-16 year olds are cared for and have their wellbeing needs met appropriately.
- Where young people are on the roll of another education establishment there will be protocols in place between the College and the designated officers at these establishments for communication regarding unexplained absence or other concerns.
- There will also be liaison with the parent and the schools.
- Young people will be appropriately supervised and registered by qualified staff in all areas of the provision.

## **9. SEND learners in College**

Learners with SEND are more likely to be abused and/or neglected, be at risk from bullying/cyber-bullying and peer group isolation. The College will monitor and support these learners through College staff and support structures in order to ensure these learners are appropriately identified and supported.

## **10. Early Help**

Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Part one of 'Working Together to Safeguard Children 2018' provides detailed guidance on the Early Help process. The Safeguarding Team will be responsible for identifying and implementing any Early Help measures which are required.

Any child may benefit from early help, but all college staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is a privately fostered child

## **12. On-line safety and E-safety**

The College will endeavour to both filter and monitor all internet usage within the College in a responsible and transparent way in order to ensure and maintain the safety of staff and learners.

## **13. Wearing of ID Passes**

In order to ensure that anyone accessing the College is provided with a safe environment, it is a requirement that all staff, learners and visitors visibly wear ID badges on the College lanyards provided in all areas of the college, both inside and outside the college environment.

- No college services will be provided to any person not wearing their lanyard and ID pass.
- All teaching staff are required to check that their learners' ID passes are worn at the start and at the end of all teaching sessions.

- Any learner who has forgotten or lost their ID pass must get a temporary ID from Customer Services. If any learner records three temporary ID pass requests in any one term this will be recorded on Promonitor for LDCs and tutors to take appropriate action with the learner.

#### **14. Contextual Safeguarding and Local Circumstances**

Lambeth College believes all learners have the right to be able to access and enjoy a high quality teaching, learning and assessment with a rich learning experience that both enhances and increases their life chances. The College serves the needs of learners from a range of backgrounds including higher proportions of:

- Learners from socio-economically deprived areas
- High needs SEND learners
- LACs/Care Leavers and Young Carers
- Lambeth College also faces on-going challenges with serious youth violence

The College will ensure that all staff have an effective understanding of the local context and all safeguarding training will acknowledge and reference the local context to ensure that staff are adequately prepared to manage such issues that arise from this.

#### **15. LAC and Care Leavers**

The College will work in close collaboration with the Virtual Schools and Children's Social Services to ensure that all Looked After Children (and previously LAC) are identified and offered appropriate support mechanisms.

The Designated Member of Staff for LAC learners is the Safeguarding Co-ordinator.

#### **16. Partnership and Information Sharing**

The College will work in conjunction with the local authority and any other external agencies such as the Police to ensure information is passed appropriately where there are safeguarding concerns and information sharing protocols are well established.

All safeguarding referral protocols will reflect the guidance laid down in Part 1 of Keeping Children Safe in Education, 2018, including Prevent referrals to Channel.

The Government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and is used by the college to support staff who have to make decisions about sharing information. [Information Sharing: Advice for Practitioners Providing safeguarding Services to Children, Young People, Parents and Carers](#) supports staff who have to make decisions about sharing information.

The Counter-Terrorism and Securities Act (2015) places additional responsibilities on

Further Education Colleges to include working with multi-agencies as part of the Channel process.

### **17. Use of Reasonable Force by staff on learners**

Keeping Children Safe in Education 2018 states that there are circumstances when it is appropriate for staff to use reasonable force to safeguard learners. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain. This can range from guiding a student to safety by the arm, to more extreme circumstances as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between learners or blocking a learner's path, or active physical contact such as leading a learner by the arm out of the classroom.

The College has adopted the Department for Education's guidance on the use of reasonable force in schools which is made available to all members of staff within the College. <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

## 18. Lambeth College Safeguarding Staff Details

Safeguarding Responsibility	Name	Job Title	Contact Details
Senior Lead for allegations against staff	Michael Pichamuthu	Chief Operating Officer	T: 0207 501 5712 E: mpichamuthu@lambeth.ac.uk
Designated Safeguarding Lead	Philip Cunniffe	Assistant Principal Curriculum and Learner Services	T: 0207 501 5772 E: pcunniffe@lambeth.ac.uk
Deputy Safeguarding Lead	Laura Ryan	Head of Student Services and ALS	T: 0207 501 5883 E: lryan@lambethcollege.ac.uk
Safeguarding Co-ordinator	Gemma Dickson	Safeguarding and Welfare Co-ordinator	T: 0207 501 5324 E: gdickson@lambeth.ac.uk
Safeguarding Officer	Rochelle McDonald	LDC Co-ordinator	T: 0207 501 5715 E: rmcdonald@lambeth.ac.uk
Supported Learning	Anne Sapalska	Curriculum Manager for Supported Learning	T: 0207 501 5378 E: asapalska@lambeth.ac.uk
Young People's Engagement	Sharon Carnegie	Head of Young People's Engagement	T: 0207 501 5449 E: scarnegie@lambeth.ac.uk
Young People's Engagement	Louise Christian	Young People's Engagement Co-ordinator	T: 0207 501 5157 E: lchristian@lambeth.ac.uk
ESOL Brixton	Asma Ahmad	Head of ESOL	T: 0207 501 5837 E: aahmed@lambeth.ac.uk
Safeguarding	Sue Dare	Designated	T: 027 501 5602

Governor		Safeguarding Governor	E: <a href="mailto:sdavidson@lambeth.ac.uk">sdavidson@lambeth.ac.uk</a> (Principal's office)
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## **Safeguarding Procedures**

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There are slightly different procedures to follow for different types of learners:

- Under 18 years old on programmes at main sites (learners 16–17 years old)
- Under 16 years old on any school linked programmes
- Under 16's who are on full-time programmes that may or may not be attached to a school i.e. Home Educated
- Apprentices
- Under 18 years olds in the College who are not enrolled as Learners – e.g. work placements from school or visitors to open days etc.
- Adults at risk of harm
- Children in the Nursery

If in doubt, contact the Safeguarding team for advice, (contact details at the end of this document).

### **Under 16 year olds on any School Link programme, formal taster event, or work experience within College**

- All participating schools must have signed the school/college contract which includes safeguarding practice, notification of vulnerability, travel arrangements, attendance monitoring/reporting and out of class supervision or workplace supervision as appropriate.
- All school link pupils must be enrolled/registered at the College and details of emergency contact recorded.
- For young people on a school link programme, the referral must go back to the Safeguarding Co-ordinator at the school they normally attend to discuss the referral and agree actions.
- When dealing with a disclosure follow section: Learners aged 16 – 17 years old.
- The Safeguarding Team have a list of School Safeguarding Co-ordinators and will pass on the disclosure to be actioned under their procedures.
- Pastoral support to be actioned within the School.

### **Learners 16-17 years old**

Where a Learner aged under 18 years old divulges information or staff become concerned that the young person is at risk of abuse, the following action will be taken:

- Staff will advise the learner that action may have to be taken as a result of the disclosure. It is not the responsibility of members of staff to investigate suspected abuse.
- A written record of the concern will be made where possible and emailed to [safeguarding@lambeth.ac.uk](mailto:safeguarding@lambeth.ac.uk).
- Referral to a member of the Safeguarding Team will be made immediately and in a conversation with the Safeguarding Officer.
- Learner's wishes regarding action to be taken will be noted where possible. However, the learner will be made aware that this will not affect the final decision to make a referral.
- There is no need to involve other members of staff (including line managers) as this reduces confidentiality.
- Make learner aware of services within the College which may be able to help them address the situation and offer support.
- Where possible the Safeguarding Officer will consult the learner regarding

the report and their wishes and inform them of action which has or will be taken. However, depending upon the circumstance, this may not always be possible.

- Where action is decided upon which necessitates contacting Children's Services or College procedures for referral will be followed within 24 hours of Safeguarding Team receiving the referral.
- Confidential records will be kept of all discussions relating to protection from abuse matters and will be stored electronically in a confidential manner.
- The Safeguarding Lead and Co-ordinator will be informed immediately of any referrals received/made.

## **Apprentices**

Workplace providers will receive a copy of the Safeguarding Policy and Procedure and information relating to their responsibility for safeguarding. Placement Officers/Assessors will carry out all risk assessments and include safeguarding discussion as part of workplace reviews with Learners. Apprentices will receive information relating to safe practice in the workplace and safeguarding contact details. When dealing with a disclosure, follow referral procedure for Learners aged 16 – 17 years old, or adult at risk of harm dependent upon their age.

Organisations seeking subcontracted work have to submit their policies and procedures.

## **Under 18 Year olds in the College who are not enrolled as Learners**

For young people who are not enrolled at the College, the referral must go back to the head of the organisation to which they are attached. The contact can be made direct or via the Safeguarding Lead and Co-ordinator if they are on site. Where there is no organisational contact available, the referral will be made direct to Children's Services.

A report of the disclosure and any action taken must be recorded and the Safeguarding Lead and Co-ordinator informed.

## **Adults at risk of harm**

Members of staff hearing allegations, follow the procedure for 16 - 17 year olds. Do not promise confidentiality and explain what might happen as a result of disclosure. The adult has a right to make their own decisions if they are competent to do so in line with the Mental Capacity Act 2005. If their competency is in doubt, contact a member of the Safeguarding Team for advice.

A report of the disclosure and any action taken must be recorded and the Safeguarding Lead and Co-ordinator informed.

## **Children in the Nursery**

- Report to Nursery Manager, or in her absence a member of the Safeguarding Team.
- All referrals to meet Early Years Ofsted expectations.
- A report of the disclosure and any action taken must be recorded and the Safeguarding Lead and Co-ordinator informed.

## **Next Steps**

Taking into account all the information available, the lead Safeguarding Manager and Team will decide on the next steps, which may include taking no further action. Where it is decided that further action is necessary, this may be to:

- Seek further advice from Social Services.
- Make a referral to Social Services (any member of staff can make a referral to social services and this must be reported to the Safeguarding Team)
- Report the incident to a designated Social Worker
- Report the matter to the police if a crime is suspected

If a referral is made, this must be confirmed in writing to the appropriate agency within 24 hours.

The Lead Safeguarding Manager will keep the member(s) of staff who raised the concerns informed of the progress/ outcome of the case where possible.

## **2. Recruitment and Selection Procedures**

Lambeth College has a responsibility to ensure safe recruitment and employment practices. All staff are checked appropriately before they start employment, including a Disclosure and Barring Service (DBS) check. The safeguarding regulations state that:

- a person who is barred from working with children or adults at risk will be breaking the law if they work or volunteer, or try to work or volunteer with those groups
- an organisation which knowingly employs someone who is barred to work with those groups will also be breaking the law

The College's recruitment and selection procedures include the following requirements:

- The post should be clearly defined and the key selection criteria for the post should be identified.
- Vacancies should be advertised widely, as appropriate, in order to ensure a diversity of applicants.
- Applicants are required to complete an application form and sign to declare the information they have provided is to be true.
- The chair of the interview panel will ask questions in respect of areas of concern and ensure the right people are selected for employment.
- Evidence of qualifications and Identity is obtained, including the eligibility of the candidate to work in the UK.
- Employment/educational references are required for successful candidates.
- The successful candidate's application form is reviewed by Human Resources and any gaps in employment or other missing information is followed up.
- Enhanced Disclosure and Barring Service (DBS) disclosures are undertaken for all employees, which are treated sensitively and confidentially.

- Where a DBS disclosure have not been received before a candidate is due to start employment then a Risk Assessment will be undertaken and authorised to ensure that it is appropriate for the candidate to start work.

### **3. Training**

Lambeth College has a duty to promote safeguarding issues and measures to staff and ensure they:

- Analyse their own practice against established good practice, and assess risk to ensure their practice is likely to protect them from false allegations
- Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse
- Follow the guidance for staff

The Designated Senior Lead for Safeguarding is required to attend training in safeguarding and receives refresher training at least every two years.

- Other designated safeguarding staff are required to have training in safeguarding and inter-agency working and receive refresher training at least every two years.
- All staff should renew the college mandatory training for safeguarding and Prevent annually
- All staff working directly with children, young people and adults at risk will undertake appropriate annual training on safeguarding to raise awareness of current issues and Legislation. All staff will be trained to understand the particular safeguarding risks for Looked After Children.
- All staff will receive an induction which will include safeguarding, prevent and the Code of Conduct.
- All other staff will undertake appropriate training on safeguarding.
- Safeguarding training is mandatory for all staff. Refusal to undertake safeguarding training, will be a matter of gross misconduct, and may lead to dismissal.

### **4. Review**

Lambeth College's Safeguarding Policy and Procedure is reviewed annually and its provisions monitored by the College Leadership Group, Learner Services and the Human Resources Department. The review process includes analysis of monitoring data, consultation with and feedback from learners, staff and other stakeholders to determine the impact of the policy and any action required.

## **Appendix A – Guidance on appropriate boundaries**

The following situations are never appropriate while working with learners:

- Drinking Alcohol
- Any illegal activity with a learner
- Having any form of sexual relationship with a learner
- Accepting money or gifts from a learner
- Lending money to learners
- Giving a learner a lift home
- Telling a learner your home address, home telephone number, or mobile number
- Taking a learner to your home/ Going to a learner's home
- Promising to keep any information they disclose confidential
- Arranging to meet a learner outside of work hours or on non-college business
- Physical contact should be avoided unless for the purpose of professional assistance such as with a learner's self-care
- Talking about a learner/member of staff in a public space where the conversation can be overheard
- Talking about a learner's private business in front of other learners
- Discussing a learner with another member of staff other than your line manager or other staff who have direct responsibility for that learner, without their consent
- Giving out any information over the telephone about learners, without their consent
- Sending e-mails or other communication containing a learners name without their consent
- Using a personal email, phone or social media site to communicate with learners
- Storing data on learners in an unlocked drawer/cabinet/filing system
- Disposing of learner data in an unsecured manner
- Taking responsibility for a learners' personal property

## Appendix B – Safeguarding Responsibilities/Contacts

### Lambeth College Safeguarding Staff Details

Safeguarding Responsibility	Name	Job Title	Contact Details
Allegations against staff	Michael Pichamuthu	Chief Operating Officer	T: 0207 501 5712 E: mpichamuthu@lambeth.ac.uk
Designated Safeguarding Lead	Philip Cunniffe	Assistant Principal Curriculum and Learner Services	T: 0207 501 5772 E: pcunniffe@lambeth.ac.uk
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Young People's Engagement and School Links	Louise Christian	Young People's Engagement Co-ordinator	T: 0207 501 5157 E: lchristian@lambeth.ac.uk
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Safeguarding Governor	Sue Dare	Designated Safeguarding Governor	T: 027 501 5602 E: <a href="mailto:sdavidson@lambeth.ac.uk">sdavidson@lambeth.ac.uk</a> (Principal's office)